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10 *Counsel for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION**

15 **-and-**

16 **PACIFIC GAS AND ELECTRIC**  
17 **COMPANY,**

**Debtors.**

- 18 ☐ Affects PG&E Corporation  
19 ☐ Affects Pacific Gas and Electric Company  
20 ☒ Affects both Debtors

21 *\*All papers shall be filed in the Lead Case,*  
22 *No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF MOTION FOR PARTIAL  
WITHDRAWAL OF THE BANKTUPRCY  
REFERENCE FOR THE LIMITED  
RESPONSE OF APPOINTING THE HON.  
ELLEN SICKLES JAMES (RET.) AS  
SPECIAL MASTER PURUANT TO FED.  
R. CIV. PROC. 53**

**Date: TBD**  
**Time: TBD**  
**Place: TBD**

**Objection deadline: November 20, 2020  
4:00 p.m. (Pacific Time)**

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28 **NOTICE OF MOTION FOR PARTIAL WITHDRAWAL OF THE BANKTUPRCY  
REFERENCE FOR THE LIMITED RESPONSE OF APPOINTING THE HON. ELLEN  
SICKLES JAMES (RET.) AS SPECIAL MASTER PURUANT TO**

1       **PLEASE TAKE NOTICE THAT** on January 29, 2019, PG&E Corporation and Pacific  
2 Gas and Electric Company, the debtors in the above captioned chapter 11 cases (the "Chapter 11  
3 Cases"), each filed a voluntary petition for relief under chapter 11 of the United States Code (the  
4 "Bankruptcy Code") with the United States Bankruptcy Court for the Northern District of  
5 California (San Francisco Division) (the "Bankruptcy Court").

6       **PLEASE TAKE FURTHER NOTICE THAT** on July 1, 2020, the Effective Date of the  
7 *Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19,*  
8 *2020* [Docket No. 8048] (together with all schedules and exhibits thereto, and as may be  
9 modified, amended, or supplemented from time to time, the "**Plan**") occurred.

10       **PLEASE TAKE FURTHER NOTICE THAT** pursuant to 28 U.S.C. § 157(d) the  
11 Honorable John K. Trotter (Ret.), in his official capacity as trustee (the "Trustee") of the PG&E  
12 Fire Victim Trust (the "Fire Victim Trust" or the "Trust"), by and through his attorneys, Brown  
13 Rudnick LLP, has filed the *Motion for Partial Withdrawal of the Bankruptcy Reference for the*  
14 *Limited Purpose of Appointing the Hon. Ellen Sickles James (Ret.) as Special Master Pursuant to*  
15 *Fed. R. Civ. Proc. 53* (the "Motion").

16       **PLEASE TAKE FURTHER NOTICE THAT** the Motion may be heard by the United  
17 States District Court for the Northern District of California (the "District Court") at a date and  
18 time to be set by the District Court, however, any relief requested in the Motion may be granted  
19 without a hearing.

20       **PLEASE TAKE FURTHER NOTICE THAT** any oppositions or responses to the  
21 Motion must be in writing, filed with the District Court, and served on the counsel for the Trustee  
22 at the above referenced addresses so as to be received by no later than 4:00 p.m. (Pacific Time)  
23 on November 20, 2020. Any oppositions or responses must be filed and served on all "Standard  
24 Parties" as defined in, and in accordance with, the Second Amended Order Implementing Certain  
25 Notice and Case Management Procedures entered on May 14, 2019 [Dkt. No. 1996] (the "Case  
26 Management Order"). Any relief requested in the Motion may be granted without a hearing if no

1 opposition is timely filed and served in accordance with the Case Management Order. In deciding  
2 the Motion, the Court may consider any other document filed in these Chapter 11 Cases.

3 **PLEASE TAKE FURTHER NOTICE THAT** copies of the Motion and its supporting  
4 papers can be viewed and/or obtained: (i) by accessing the Court's website at  
5 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450  
6 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims  
7 again, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217  
8 for U.S. based parties; or +1(929) 333-8977 for International parties or by e-mail at  
9 [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
10 Bankruptcy Court's website.

11 Dated: November 6, 2020

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